

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

)	
IN RE: DEALER MANAGEMENT SYSTEMS)	MDL No. 2817
ANTITRUST LITIGATION)	Case No. 1:18-CV-00864
)	
<hr/> <i>This document relates to:</i>)	
)	Hon. Robert M. Dow, Jr.
ALL CASES)	Magistrate Judge Jeffrey T. Gilbert
)	

**DEFENDANTS' MOTION FOR ENTRY OF
A DEPOSITION PROTOCOL TO GOVERN MDL DEPOSITIONS**

Defendants CDK Global, LLC, Computerized Vehicle Registration, and The Reynolds and Reynolds Company (“Defendants”) hereby move, pursuant to the authorities cited in the accompanying memorandum of law, for the entrance of the accompanying Deposition Protocol Order. In support of this Motion, Defendants incorporate by reference the memorandum of law filed concurrently herewith and any further argument that the Court may allow.

Pursuant to Local Rule 37.2, Defendants certify that they met and conferred, via telephone, with counsel for both the Individual Plaintiffs and the Dealership Class Plaintiffs in a good faith attempt to resolve the dispute presented by this Motion. These telephonic conferences took place on Thursday, August 30, Friday, September 7, and Friday, September 14 and included participation, among others, of Aundrea Gulley for The Reynolds & Reynolds Company, Matthew Provance for CDK Global, LLC and Computerized Vehicle Registration, Michael Nemelka for the Individual Plaintiffs, and Peggy Wedgworth for the Dealership Class Plaintiffs. In addition, the parties engaged in various email correspondence between August 27 and September 18 in an attempt to resolve as many of their differences as possible, but have been unable to reach complete agreement.

Dated: September 18, 2018

Respectfully submitted,

/s/ Britt M. Miller

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CERTIFICATE OF SERVICE

I, Aundrea Gulley, an attorney, hereby certify that on September 18, 2018, I caused a true and correct copy of the foregoing Motion to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Aundrea Gulley

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